

Motion for Relief Worksheet Instructions

**PLEASE REVIEW THE INSTRUCTIONS BELOW PRIOR TO EXECUTING THE
ATTACHED DOCUMENT.**

The information we have used to complete the worksheet comes from the referral documents. If there are any issues with this information or changes subsequent to the referral reflected in your records, please update the attached document or inform us and we will make the changes for your review and approval. The worksheet must be executed by the party with actual knowledge of the information provided based upon his or her review of your business records. Prior to signing, please review the following:

1. The attached document is a worksheet that is required by the Bankruptcy Court to be submitted in conjunction with the motion for relief that we have been requested to file on your behalf.
2. The document will be filed in Federal Court and must be signed under the pains and penalties of perjury.
3. Prior to signing, please review all of the statements contained in the attached document to make sure that they are complete and accurate and are supported by the information contained in your business records. Please make any required changes prior to signing.
4. Please make sure that you have reviewed any documents that are referenced and attached to the worksheet and verify that these documents are kept in your records. If any document that is referenced is missing, please do not execute the attached until you have obtained and reviewed the document that is referenced.
5. If you are authorized to sign on behalf of an entity, please make sure that your signature information, capacity and title are accurate.
6. This law office will sign the portion of the document which relates to the current liens.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND**

IN RE: Ivy K. Nimley

Taylor, Bean & Whitaker Mortgage Corp

VS.

Ivy K. Nimley

CHAPTER 13
CASE NO. 15-10747-DF

RELIEF FROM STAY WORKSHEET - REAL ESTATE

I, Travis Hunter of Taylor, Bean & Whitaker Mortgage Corp, do hereby declare (or certify, verify, or state):

BACKGROUND INFORMATION

1. Real property address which is the subject of this motion: 162 Courtland Street, Providence, RI 02909
2. Lender Name: Taylor, Bean & Whitaker Mortgage Corp., 1417 North Magnolia Ave, Ocala, FL 34475
3. Date of Mortgage: 08/30/2006
4. Post-Petition payment address: P.O. Box 19409, Charlotte, NC 28219

5. The manner in which the movant perfected its interest in the property: Recorded Mortgage and Recorded Assignment of Mortgage
6. All other material liens and encumbrances on the property: Taylor, Bean & Whitaker Mortgage Corp. – second mortgage

DEBT/VALUE REPRESENTATIONS

7. Total pre-petition and post-petition indebtedness of Debtor(s) to Movant at the time of filing the motion: \$430,792.78 (Note: This amount is not to be relied on as a "payoff" quotation.
8. Movant's estimated market value of the real property: \$189,400.00
9. Source of estimated valuation: Debtor's Schedules

STATUS OF DEBT AS OF THE PETITION DATE

10. Total pre-petition indebtedness of Debtor(s) to Movant as of petition filing date: \$426,120.66
 - i. Amount of principal: \$248,000.00
 - ii. Amount of interest: \$101,263.13
 - iii. Amount of escrow (taxes and insurance): \$65,229.25
 - iv. Amount of forced placed insurance expended by Movant: \$0.00
 - v. Amount of Attorney's fees billed to Debtor(s) pre-petition: \$5,775.14

vi. Amount of pre-petition late fees, if any, billed to Debtor(s): \$1,113.59

11. Contractual interest rate: 8.125%. (If interest rate is (or was) adjustable, please list the rate(s) and date(s) the rate(s) was/were in effect on a separate sheet and attach the sheet as an exhibit to this form; please list the exhibit number here: ____.)

12. Please explain any additional pre-petition fees, charges or amounts charged to Debtor's/Debtor's account and not listed above: Advertisement costs: \$1,074.28; Title costs: \$535.00; Appraisal/BPO fees: \$1,130.00; Property inspection fees: \$1,005.00; Property preservation expenses: \$95.00; Motion For Relief Filed & Filing Fee: \$726.00; Certified Mail Required by Statute: \$117.27; Municipal Lien Certificate: \$25.00; Photos: \$32.00

(If additional space is needed, please list the amounts on a separate sheet and attach the sheet as an exhibit to this form; please list the exhibit number here : ____.)

**STATUS OF DEFAULT
(AS OF 7/8/2015)**

13. Date last payment was received: N/A

14. Alleged total number of payments post-petition from filing of petition through payment due on 7/1/15: 3

SCHEDULE OF PAYMENTS THAT WERE DUE:

Date Payment Due	Payment Amount Due Post Petition
5/1/15	\$1,411.76
6/1/15	\$1,411.76
7/1/15	\$1,411.76
Total:	\$4,235.28

SCHEDULE OF PAYMENTS THAT WERE RECEIVED:

Date	Amount Received	Amount Applied to Principal and Interest	Amount Applied to Escrow	Late Fee Charged (if any)	Amount Applied to Legal Fees or Costs (specify)
	N/A				

15. Amount of Movant's Attorneys fees billed to Debtor for the preparation, filing and prosecution of this motion: \$1,026.00
16. Amount of Movant's filing fee for this motion: \$0.00
17. Other Attorney's fees billed to Debtor post-petition: \$1,273.50
18. Amount of Movant's post-petition inspection fees: \$0.00
19. Amount of Movant's post-petition appraisal/broker's price opinion: \$0.00
20. Amount of forced placed insurance or insurance provided by the Movant post-petition: \$0.00
21. Sum held in suspense by Movant in connection with this contract, if applicable: \$0.00
22. Amount of other post-petition advances or charges: i.e., taxes, insurance incurred by Debtor, etc.: \$1,567.29
23. Amount and date of post-petition payments offered by the debtor and refused by the movant: \$0.00 Date(s) N/A

REQUIRED ATTACHMENTS TO MOTION

Please attach the following documents to this motion and indicate the exhibit number associated with the documents.

(1) Copies of documents that indicate Movant's interest in the subject property. For purposes of example only, a complete and legible copy of the promissory note or other debt instrument together with a complete and legible copy of the mortgage and any assignments in the chain from the original mortgagee to the current moving party. (Exhibit A.)

(2) Copies of documents establishing proof of standing to bring this Motion. (Exhibit A.)

(3) Copies of documents establishing that Movant's interest in the real property was perfected. For the purposes of example only, a complete and legible copy of the Financing Statement (UCC-1) filed with either the Clerk's Office of the Register or the country the property is located in. (Exhibit .)

CERTIFICATION AND DECLARATION FOR BUSINESS RECORDS

I certify that the information provided in this worksheet and/or exhibits attached to this worksheet is derived from records that were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters, were kept in the course of the regularly conducted activity; and were made by the regularly conducted activity as a regular practice.

I further certify that copies of any transactional documents attached to this worksheet as required by paragraphs 1,2, and 3, immediately above, are true and accurate copies of the original documents. I further certify that the original documents are in movant's possession, except as follows: _____

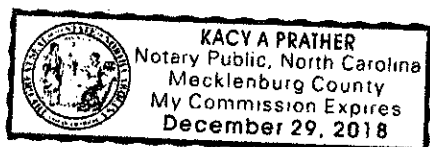
I/we declare (or certify, swear, affirm, verify or state) that the foregoing is true and correct.

Executed on 7/17/15 [date]


[Signature]

ALP- Bankruptcy
[Title]

Subscribed and sworn to before me this 7/17/15 [date]



Kacy A. Prather
Notary Public [Name]

My commission Expires: 12/29/18
[Date]

Responses as to Question 6

T. Tabachnik
Tatyana P. Tabachnik, Esquire
Harmon Law Offices, P.C.